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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

GLOBAL BIO RESOURCES, INC.,	)	
a Wyoming corporation,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Civil Action No. 22-CV-68-SWS
	)	
JAKE CANTRELL, KEN MORGAN,	)	
TERRY DIARDICHUK, MICHAEL	)	
MURRAY, and DAREL MOE,	)	
individuals,	)	
	)	
Defendants.	)	

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**STIPULATED MOTION TO DISMISS WITH PREJUDICE**

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Plaintiff Global Bio Resources, Inc. (“GBR”), by and through its undersigned counsel, DAVIS & CANNON, LLP, and Defendants, by and through their undersigned counsel, HATHAWAY & KUNZ, LLP, hereby file this *Stipulated Motion to Dismiss with Prejudice*. In support, the Parties state:

1. This Court entered its Order on Mediation on June 7, 2023. ECF No. 105.
2. The Parties held a mediation on June 27, 2023.
3. At the mediation, the Parties successfully concluded a verbal settlement agreement resolving all claims at issue in this litigation.

4. The terms of the settlement agreement provide that (1) Defendants waive any and all claims to be shareholders in GBR and any claim for compensation from GBR is hereby satisfied upon the completion of the terms of the settlement agreement and, therefore, any and all other claims for compensation of any kind, type, or class are waived upon completion thereof; (2) no Defendant shall make any further claim that any such consent action is or was effective to remove the GBR Directors consisting of Messrs. Wardian, Chapman, and Grainey and officers consisting of Mr. Wardian as CEO/President and Mr. Chapman as Vice President; and (3) no Defendant shall make any further claim that any purported corporate action is or was effective to remove the GBR Directors consisting of Messrs. Wardian, Chapman, and Grainey and officers consisting of Wardian as CEO/President and Chapman as Vice President. In exchange, GBR is compensating Defendants for services performed as founders of the company.

5. WHEREFORE, the Parties respectfully request the Court grant their *Stipulated Motion to Dismiss with Prejudice*.

**[SIGNATURE PAGE FOLLOWS]**

Dated this 26<sup>th</sup> day of July, 2023.

DAVIS & CANNON, LLP

By: /s/ Benjamin J. Rowland  
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*Attorneys for Defendants*

**CERTIFICATE OF EXCHANGE**

I hereby certify that I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing on the 26<sup>th</sup> day of June, 2023, to the following:

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